

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JOHN L. STINSON, JR., SHARIKA )		
HORTON, NATHANIEL RAY )		
JOHNSON, HELEN MARIE )		
SCHLUETER, individually and )		CIVIL ACTION NO.
behalf of other similarly situated )		1:22-cv-01342-TWT
individuals, )		
)		
Plaintiffs, )		
)		
v. )		
)		
LOCKHEED MARTIN )		
CORPORATION )		
)		
Defendant. )		

**JOINT MOTION TO CONDITIONALLY CERTIFY CLASS AND  
APPROVE COLLECTIVE ACTION NOTICE**

COME NOW, Plaintiffs John L. Stinson, Jr., Sharika Horton, Nathaniel Ray Johnson, Helen Marie Schlueter (“Plaintiffs”) and Defendant Lockheed Martin Company (“Defendant”), and jointly move this Court to conditionally certify the action and approve their Collective Action Notice, showing the Court as follows:

1.

Pursuant to the Scheduling Order [Ecf. 18, p. 4] Plaintiffs and Defendant have conferred regarding the Scope of Conditional Certification and submit this proposed Motion within thirty (30) days of the close of limited discovery.

2.

The Parties have entered into certain, proposed stipulations regarding the scope of conditional certification, notice to potential members of the collective, and certain deadlines. The proposed stipulations are attached as Exhibit 1.

3.

The Parties have also reached agreement regarding the form of the Notice to potential members of the collective, which is attached hereto as Exhibit 2.

4.

A proposed Order granting this Motion is attached as Exhibit 3.

5.

The Parties respectfully request that this Court enter an Order granting this Motion and approving the Stipulation to Conditional Certification and Notice of Collective Action attached hereto as Exhibit 1 and Exhibit 2, respectively.

Respectfully submitted this 7th day of November, 2022.

/s/Douglas R. Kertscher

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FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**JOHN L. STINSON, JR.,  
SHARIKA HORTON,  
NATHANIEL RAY JOHNSON,  
HELEN MARIE SCHLUETER,**  
individually and behalf of other  
similarly situated individuals,

Plaintiff,

**vs.**

**LOCKHEED MARTIN  
CORPORATION,**

Defendant.

CIVIL ACTION FILE NO.:  
**1:22-cv-01342-TWT**

**JURY TRIAL DEMANDED**

**CERTIFICATE OF SERVICE**

This is to certify that I have on this date caused to be served upon all counsel a true and correct copy of the within and foregoing **JOINT MOTION TO CONDITIONALLY CERTIFY CLASS AND APPROVE COLLECTIVE ACTION NOTICE** with the Clerk of the Court using the CM/ECF system that automatically sends e-mail notification of such filing to counsel of record.

This 7th day of November, 2022.

/s/ Douglas R. Kertscher  
Douglas R. Kertscher  
Georgia Bar No. 416265